

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

-----X,
HITLER CALLE, *individually and on behalf of others*
similarly situated,

Plaintiffs,

-against-

PIZZA PALACE CAFÉ LLC (D/B/A PIZZA
PALACE, SASHA ISHAQOV, YURI ISHAQOV, and
VLADY DJOURAEV ,

Defendants.

-----X

**20-cv-4178
NOTICE OF MOTION
FOR DEFAULT
JUDGMENT**

NOTICE OF MOTION

Please take notice that, upon the annexed affirmation of Michael Faillace, and attached exhibits, and the affidavits of Plaintiff Hitler Calle and all prior papers and proceedings in this case, the Plaintiff, by counsel, will move the court, on such date as is set by the Court, pursuant to Fed. R. Civ. P. 55(b) (2) and Local Rule 55.2(b), for judgment by default against Defendants Pizza Palace Café LLC, Sasha Ishaqov, Yuri Ishaqov, and Vlady DjouraeV

Answering papers, if any, shall be served on the undersigned no later than fourteen days after service of the moving papers in accordance with Local Rule 6.1(b), or at such other time as the court may direct.

Dated: New York, New York
May 12, 2021

MICHAEL FAILLACE & ASSOCIATES, P.C.

By: /s/ Michael Faillace
Michael Faillace Esq.
60 East 42nd Street, Suite 4510
New York, New York 10165
(212) 317-1200
Attorneys for Plaintiff